# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| U.S. EQUAL EMPLOYMENT                     | )  |
|---|--|
| OPPORTUNITY COMMISSION,                   | )  |
| Plaintiff,                                | ) Civil Action No. 1:22-cv-00280-CB<br>Honorable Cathy Bissoon |
| V.  |  |
| HEARTFELT HOME HEALTHCARE SERVICES, INC., | )<br>)<br>)  |
| Defendant.                                | )<br>)<br>)  |

### JOINT MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff U.S. Equal Employment Opportunity Commission (the "Commission" or "EEOC") and Defendant Heartfelt Home Healthcare Services, Inc. ("Defendant") respectfully move the Court for approval and entry of the attached Consent Decree (Exhibit 1). In support of the Motion, the parties state as follows:

- 1. The Commission and Defendant have negotiated the attached Consent Decree as a resolution of the Commission's claims in the above-captioned case.
- 2. The Commission and Defendant believe that the terms of this Consent Decree are adequate, fair, reasonable, equitable and just.
- 3. The Commission and Defendant believe that the Consent Decree conforms with the Federal Rules of Civil Procedure and is not in derogation of the rights or privileges of any person. The entry of this Consent Decree will further the objectives of the Title VII of the Civil Rights Act of 1964, as amended, and the Americans with Disabilities Act of 1990, as amended, and will be in the best interests of the parties, those for whom the Commission seeks relief, and the public.

## Respectfully submitted,

/s/

CASEY M. SHEA
SENIOR TRIAL ATTORNEY
MD Bar No. 1706200165
(Admitted *pro hac vice*)
EEOC – Baltimore Field Office
George H. Fallon Federal Building
31 Hopkins Plaza, Suite 1432
Baltimore, Maryland 21201
Phone: (410) 801-6728

Fax: (443) 992-7880 E-mail: casey.shea@eeoc.gov

Counsel for Plaintiff EEOC

s/

Mark J. Kuhar PA I.D. No. 71185 MacDonald, Illig, Jones & Britton LLP 100 State Street, Suite 700 Erie, PA 16507-1459 E-mail: mkuhar@mijb.com

Phone: (814) 870-7603 Fax: (814) 454-4647

Counsel for Defendant

# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| U.S. EQUAL EMPLOYMENT     |  |
|---------------------------|--|
| OPPORTUNITY COMMISSION,   | )  |
| Plaintiff,                | ) Civil Action No. 1:22-cv-00280-CB<br>Honorable Cathy Bissoon |
| v.                        | )  |
| HEARTFELT HOME HEALTHCARE | )<br>)   |
| SERVICES, INC.,           | )  |
| Defendant.                | )<br>)   |
|                           |  |

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 10, 2023, I filed a true and correct copy of the foregoing Joint Motion for Entry of Consent Decree with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Respectfully submitted,

For Plaintiff U.S. Equal Employment Opportunity Commission:

CASEY M. SHEA
SENIOR TRIAL ATTORNEY
MD Bar No. 1706200165
(Admitted pro hac vice)
EEOC – Baltimore Field Office
George H. Fallon Federal Building
31 Hopkins Plaza, Suite 1432
Baltimore, Maryland 21201
Phone: (410) 801-6728
Fax: (443) 992-7880

E-mail: casey.shea@eeoc.gov